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Xinhua Finance Media Limited, Fredy Bush
and Shelly Singhal*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

<p>IN RE XINHUA FINANCE MEDIA, LTD. SECURITIES LITIGATION</p> <p>This Document Relates To:</p> <p>ALL ACTIONS</p>	<p>MASTER FILE 07 Civ. 3994 (LTS)</p> <p>NOTICE OF MOTION AND MOTION OF DEFENDANTS XINHUA FINANCE MEDIA LIMITED, FREDY BUSH AND SHELLY SINGHAL TO DISMISS CONSOLIDATED AMENDED CLASS ACTION COMPLAINT FOR VIOLATIONS OF FEDERAL SECURITIES LAWS</p> <p>ORAL ARGUMENT REQUESTED</p>
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TO PLAINTIFFS AND THEIR COUNSEL OF RECORD:

Notice is hereby given that defendants Xinhua Finance Media, Ltd. (“Xinhua” or the “Company”), Fredy Bush and Shelly Singhal (collectively, “Xinhua Defendants”) hereby move the Court before the Honorable Laura Taylor Swain, United States District Judge, United States

District Court for the Southern District of New York, 500 Pearl Street, New York, New York, at a date and time to be determined, for an Order dismissing plaintiffs' Consolidated Amended Class Action Complaint for Violations of Federal Securities Laws ("Complaint"). The Xinhua Defendants move to dismiss the Complaint with prejudice under Federal Rules of Civil Procedure 12(b)(6) and 9(b) on the grounds that the claims under Sections 11, 12(a)(2) and 15 of the Securities Act of 1933, 15 U.S.C. §§ 77k, 77l(a)(2), and 77o, respectively, fail to state a claim and further fail to plead fraud with particularity.

This Motion is based on this Notice and Motion; the accompanying Memorandum of Law; the Declaration of Gideon A. Schor, together with accompanying exhibits; all pleadings and papers filed herein; oral argument of counsel; and any other matter that may be submitted at the hearing.

The Xinhua Defendants respectfully request oral argument.

Dated: December 21, 2007

WILSON SONSINI GOODRICH & ROSATI
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By: /s/ Gideon A. Schor
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